

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Louis A. Morris, Jr
Paula J. Morris

Debtor(s)

Case No.: 19-12370-elf

Chapter 13

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF
AUTOMATIC STAY FILED BY SELENE FINANCE, LP**

COMES NOW, Debtors, Louis A Morris Jr and Paula J Morris, hereinafter referred to as "Debtors," by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Selene Finance LP, "Movant", and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Denied. Debtor alleges all payments have been made to creditor.
10. Denied
11. Admitted.
12. Denied.
13. Denied.

14. Denied.

15. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: June 2, 2021

/s/ Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
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